

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

<hr/>		X
LAWRENCE MALLY, On Behalf of Himself	:	Civil Action No. 1:07-cv-07097-DLC
and All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
QIAO XING UNIVERSAL TELEPHONE,	:	
INC., et al.,	:	
	:	
Defendants.	:	
<hr/>		
MILTON PFEIFFER, On Behalf of Himself	:	Civil Action No. 1:07-cv-07252-DLC
and All Others Similarly Situated,	:	
	:	<u>CLASS ACTION</u>
Plaintiff,	:	
	:	
vs.	:	
	:	
QIAO XING UNIVERSAL TELEPHONE,	:	
INC., et al.,	:	
	:	
Defendants.	:	
<hr/>		
[Caption continued on following page.]	:	X

NOTICE OF MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF
AND FOR APPROVAL OF SELECTION OF LEAD COUNSEL

ISAAC FISHMAN, CUSTODIAN FOR THE
IBF FOUNDATION, On Behalf of Itself and
All Others Similarly Situated,

Plaintiff,

vs.

QIAO XING UNIVERSAL TELEPHONE,
INC., et al.,

Defendants.

MICHAEL LOCKE, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

QIAO XING UNIVERSAL TELEPHONE,
INC., et al.,

Defendants.

REUVEN LAPIN, Individually and On Behalf
of All Others Similarly Situated,

Plaintiff,

vs.

QIAO XING UNIVERSAL TELEPHONE,
INC., et al.,

Defendants.

X

Civil Action No. 1:07-cv-07312-DLC

CLASS ACTION

Civil Action No. 1:07-cv-07693-DLC

CLASS ACTION

Civil Action No. 1:07-cv-07829-DLC

CLASS ACTION

X

PLEASE TAKE NOTICE that Institutional Investor Macomb County Employees' Retirement System ("Macomb County") will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing Macomb County as Lead Plaintiff; (iii) approving Macomb County's selection of the law firm of Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, Macomb County submits herewith a Memorandum of Law and Declaration of Mario Alba Jr. dated October 9, 2007.

DATED: October 9, 2007

COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP

/s/ Mario Alba Jr.

MARIO ALBA JR.

SAMUEL H. RUDMAN
DAVID A. ROSENFELD
MARIO ALBA JR.
58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

[Proposed] Lead Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I, Mario Alba Jr., hereby certify that on October 9, 2007, I caused a true and correct copy of the attached:

Notice of Motion for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel;

Memorandum in Support of the Motion of the Macomb County Employees' Retirement System for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel; and

Declaration of Mario Alba Jr. in Support of the Motion of the Macomb County Employees' Retirement System for Consolidation, Appointment as Lead Plaintiff and for Approval of Selection of Lead Counsel

to be served: (i) electronically on all counsel registered for electronic service for this case; and (ii) by first-class mail to all additional counsel on the attached service list.

/s/ Mario Alba Jr.

Mario Alba Jr.

QIAO XING

Service List - 10/9/2007 (07-0203)

Page 1 of 2

Counsel For Defendant(s)

Jack C. Auspitz
Joel Charles Haims
Lily M. Fan
Morrison & Foerster LLP
1290 Avenue of the Americas
New York, NY 10104-0050
212/468-8000
212/468-7900(Fax)

Counsel For Plaintiff(s)

Evan J. Smith
Brodsky & Smith, LLC
240 Mineola Blvd., 1st Floor
Mineola, NY 11501
516/741-4977
516/741-0626(Fax)

Michael Goldberg
Glancy Binkow & Goldberg LLP
1801 Avenue of the Stars, Suite 311
Los Angeles, CA 90067
310/201-9150
310/201-9160(Fax)

Frederic S. Fox
Joel B. Strauss
Jeffrey P. Campisi
Kaplan, Fox & Kilsheimer LLP
850 Third Avenue, 14th Floor
New York, NY 10022
212/687-1980
212/687-7714(Fax)

Jacob T. Fogel
Law Offices of Jacob T. Fogel
32 Court Street, Suite 602
Brooklyn, NY 11201
718/221-5552
718/875-4500(Fax)

Marvin L. Frank
Murray, Frank & Sailer LLP
275 Madison Avenue, Suite 801
New York, NY 10016
212/682-1818
212/682-1892(Fax)

Marc I. Gross
Jeremy A. Lieberman
Pomerantz Haudek Block Grossman & Gross
LLP
100 Park Avenue, 26th Floor
New York, NY 10017-5516
212/661-1100
212/661-8665(Fax)

QIAO XING

Service List - 10/9/2007 (07-0203)

Page 2 of 2

Patrick V. Dahlstrom
Pomerantz Haudek Block Grossman & Gross
LLP
One North LaSalle Street, Suite 2225
Chicago, IL 60602-3908
312/377-1181
312/377-1184(Fax)

Richard A. Maniskas
D. Seamus Kaskela
Schiffrin Barroway Topaz & Kessler, LLP
280 King of Prussia Road
Radnor, PA 19087
610/667-7706
610/667-7056(Fax)

Gregory M. Nespole
Gustavo Bruckner
Wolf Haldenstein Adler Freeman & Herz, LLP
270 Madison Avenue
New York, NY 10016
212/545-4600
212/545-4653(Fax)